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STATE OF HAWAII OFFICE OF THE DIRECTOR DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS

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January 8, 2018

CATHERINE P. AWAKUNI COLÓN DIRECTOR

JO ANN M. UCHIDA TAKEUCHI

The Honorable Ajit Pai Chairman Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, and related dockets (GN Docket No. 12-268; ET Docket No. 14-165; MB Docket No. 15-146; ET Docket No. 16-56)

Dear Chairman Pai:

The State of Hawaii recognizes that access to high-speed Internet is essential in today's world for education, healthcare, civic and social engagement, and economic opportunity. As a small multi-island state, Hawaii faces many challenges particularly in reaching the unserved and underserved rural areas across the State. Our beautiful and unique geography of soaring mountains, deep valleys, thick tropical forests, rugged volcanic terrain, and erupting volcanoes makes it difficult and costly to deploy last mile infrastructure to connect these rural areas.

As one of the State's agencies charged to facilitate public and private entities' deployment of advanced Internet access services in the State, the Department of Commerce and Consumer Affairs (DCCA) explores ways to extend service in those areas where high infrastructure deployment costs present a difficult business case for providers. DCCA has specifically examined TV white space technology for its potential to provide access to those citizens in the hardest to reach rural areas of the State that present various terrain challenges and forest densities. DCCA discovered, however, that certain issues with the technology needed to be addressed to take advantage of its full potential to reach these rural areas.

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To encourage the strong private investment needed to advance use of this technology, DCCA supports the reservation of three TV white space channels across the U.S. for the purpose of extending broadband access. DCCA is confident that the Commission can find a balance to address the concerns of all parties and thereby enable use of this technology to provide affordable access to those citizens in rural America with the greatest need.

Thank you for your consideration.

Sincerely,

CATHERINE P. AWAKUNI COLÓN

Director